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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

H.F. and C.A., v. Meta, et al., 4:24-cv-
 08885;

SB and JC, v. Meta, et al., 4:24-cv-09400;

RN and AR, v. Meta, et al., 4:24-cv-09406;

AG and MT, v. Meta, et al., 4:24-cv-09354;

*T.S. ind. & obo E.S., v. ByteDance, Ltd, et
 al.*, 4:25-cv-00060;

*L.G. ind. & obo E.B., v. ByteDance, Ltd, et
 al.*, 4:25-cv-00100;

D.M. and M.A., v. Meta, et al., 4:25-cv-
 00118;

*L.G. ind. & obo K.B., v. ByteDance, Ltd, et
 al.*, 4:25-cv-00122;

E.W. and K.W., v. Meta, et al., 4:25-cv-
 00161;

M.S. and S.K., v. Meta, et al., 4:25-cv-00169;

**PLAINTIFFS' THIRTEENTH
 CONSOLIDATED EX PARTE
 APPLICATION FOR APPOINTMENT OF
 GUARDIANS AD LITEM**

1 *M.C. ind. & obo A.N., v. Meta, et al.*, 4:25-
cv-00270;

2 *B.R. and L.R., v. Meta, et al.*, 4:25-cv-00282;

3 *A.B. by and through her Guardian Ad Litem*
4 *Robert Budreau v. Meta, et al.*, 4:25-cv-
01269;

5 *J. C., by and through his Guardian Ad Litem,*
6 *Kenyatta Leflore v. Meta, et al.*, 4:25-cv-
02399;

7 *K.H., by and through April Howell v. Snap*
8 *Inc et. al.*, 4:25-cv-02985.

9 APPLICATION

10 Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians
11 *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby
12 submits Plaintiffs’ Thirteenth Consolidated *Ex Parte* Application for Appointment of Guardians
13 *Ad Litem* (“*Ex Parte* Application”) for this Court’s consideration.

14 “Fit parents are presumed to act in the best interests of their children.” *J.B. by &*
15 *Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021
16 WL 3115195, at *2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000);
17 *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-
18 RS, 2015 WL 7350183, at *1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party
19 to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the
20 parent as guardian ad litem upon receipt of an ex parte application without exercising much
21 discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed
22 guardian ad litem.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL
23 2002370, at *3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-
24 01165-AWI NEW (TAG), 2007 WL 1390672, at *3 (E.D. Cal. May 9, 2007)); *accord J.M. v.*
25 *Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at *2 (N.D. Cal. Sept.
26 16, 2016). However, “[w]hen there is a potential conflict between a perceived parental
27 responsibility and an obligation to assist the court in achieving a just and speedy determination of
28 the action, a court has the right to select guardian ad litem who is not a parent if that guardian

1 would best protect the child's interests." *J.M.*, 2016 WL 4942999, at *1 (citations omitted)
2 (internal quotation marks omitted).

3 Attached as Exhibits 1-15 to the Declaration of Jennie Lee Anderson in Support of
4 Plaintiffs' Twelfth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
5 ("Anderson Decl." or "Anderson Declaration") are the *Ex Parte* Applications for Appointment of
6 Guardians *Ad Litem* ("Applications") submitted by the parents and/or legal guardians of individual
7 minor Plaintiffs in the following cases.

- 8 • *H.F. and C.A. v. Meta, et al.*, 4:24-cv-08885 (Exhibit 1);
- 9 • *SB and JC v. Meta, et al.*, 4:24-cv-09400 (Exhibit 2);
- 10 • *RN and AR v. Meta, et al.*, 4:24-cv-09406 (Exhibit 3);
- 11 • *AG and MT v. Meta, et al.*, 4:24-cv-09354 (Exhibit 4);
- 12 • *T.S. ind. & obo E.S. v. ByteDance, Ltd, et al.*, 4:25-cv-00060 (Exhibit 5);
- 13 • *L.G. ind. & obo E.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00100 (Exhibit 6);
- 14 • *D.M. and M.A. v. Meta, et al.*, 4:25-cv-00118 (Exhibit 7);
- 15 • *L.G. ind. & obo K.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00122 (Exhibit 8);
- 16 • *E.W. and K.W. v. Meta, et al.*, 4:25-cv-00161 (Exhibit 9);
- 17 • *M.S. and S.K. v. Meta, et al.*, 4:25-cv-00169 (Exhibit 10);
- 18 • *M.C. ind. & obo A.N. v. Meta, et al.*, 4:25-cv-00270 (Exhibit 11);
- 19 • *B.R. and L.R. v. Meta, et al.*, 4:25-cv-00282 (Exhibit 12);
- 20 • *A.B. by and through her Guardian Ad Litem Robert Budreau v. Meta, et al.*, 4:25-cv-
21 01269 (Exhibit 13);
- 22 • *J. C., by and through his Guardian Ad Litem, Kenyatta Leflore v. Meta, et al.* 4:25-cv-
23 02399 (Exhibit 14); and
- 24 • *K.H., by and through April Howell v. Snap Inc et al.*, 4:25-cv-02985 (Exhibit 15).

Exhibits 1-15 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the Anderson Declaration as Exhibits 1-15 are consistent with Attachment A to this Court's Guardian *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information (including address, email, and telephone number); (2) the name, case number, state of domicile (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully competent and qualified to understand and protect the rights of the minor plaintiff and has no interests adverse to the interests of that person. Anderson Decl. ¶ 18.

Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or legal guardians in the cases listed above are deemed presumptively approved upon filing, as there is no apparent conflict between the applicants' parental responsibility and their obligation to assist the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing *J.M.*, 2016 WL 494299, at *1). This Court also ordered that, absent the filing of an objection, the presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is filed. ECF No. 122 ¶ 5. The objection period will close on April 21, 2025.

Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: April 4, 2025

Respectfully submitted,

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